

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA	:	Case No. 1:18CR109
	:	
Plaintiff,	:	Judge Black
	:	
v.	:	
	:	
Andrey Shuklin, et al.,	:	
	:	
Defendants.	:	
	:	
	:	
	:	

ADDENDUM TO MOTION FOR BOND

Now comes Defendant, Andrey Shuklin, by and through counsel, and respectfully moves this honorable Court to release him on bond with any conditions that this Court deems appropriate, including the surrender of his passport along with his wife's and child's passports. The addendum to Shuklin's motion for bond is attached.

As this Court is aware, Mr. Shuklin has previously filed a motion for bond based on a lack of dangerous or risk of flight. We have received a voluminous amount of discovery regarding Mr. Shuklin's case in a non-searchable format. At least the first round of discovery contains TIF files which require that each page be opened individually. There are years' worth of documents, phone recordings, interviews, etc., that will require several hundred hours of work. While we are chipping away at the discovery, we are unable to have the assistance of Mr. Shuklin without somebody visiting him in jail.

We respectfully ask that this Court release Mr. Shuklin so that, in addition to the reasons stated in previous filings, he may assist us in reviewing discovery.

Respectfully submitted,

/s/ Martin S. Pinales

MARTIN S. PINALES (0024570)

ERIC G. ECKES (0091840)

Pinales, Stachler, Young, Burrell & Crouse Co., LPA

455 Delta Ave., Suite 105

Cincinnati, Ohio 45226

(513) 252-2750

(513) 252-2751

mpinales@pinalesstachler.com

eeckes@pinalesstachler.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via this Court's electronic filing system on all counsel of record on this 12th day of November, 2018.

/s/ Martin S. Pinales

MARTIN S. PINALES (0024570)